

# **Exhibit D**

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**From:** Carickhoff, Jr., David W. <dcarickhoff@archerlaw.com>  
**Sent:** Thursday, April 6, 2023 2:44 PM  
**To:** Frederick B. Rosner; Zhao (Ruby) Liu  
**Cc:** Hall, Bryan J.  
**Subject:** Team Systems - Alleged A/R

Fred – following up on our conversation regarding Mott attempting to collect alleged A/R.

We have been asking for months about the alleged \$6m A/R due from FEMA in connection with the containers and the support for the same. No support has been provided. Any risk of running out of time to submit such claim(s) is by your clients' own doing.

We have been asking since the conversion to be provided with any necessary credentials. As of this writing, we have not been provided with TSI's credentials to SAM. Those credentials need to be provided to the trustee and he can update the bank information.

We have spoken with Venable regarding the certification of any claim submitted to FEMA. We are told that law firms do not certify claims on behalf of contractors, as the contractor is in the best position to certify said claim. So that is a non-starter.

Once Mott prepares a claim for submission, we'll need her to meet with the trustee and get him comfortable with the claim. If he is not comfortable with the claim, it will not be submitted. The trustee retains full control and authority as to whether any claim is submitted.

In terms of mediation, the trustee will agree to an in-person mediation. Your clients will need to fund the mediation, as the estate is administratively insolvent at this point. To avoid any issues regarding any settlement reached, we ask that we be provided with a letter by Mott's physician to the effect that she is of sound mind and has no lingering mental health issues in connection with her alleged Covid problems. Your clients should make a meaningful settlement proposal before mediation so we can assess whether it will be productive. The litigation would not be stayed during any such mediation.

**David W. Carickhoff, Jr., Esq.**

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